



June 6, 2007

Mr. Michael Simon  
Idaho Department of Environmental Quality  
1410 N. Hilton  
Boise ID 83706-1255

RE: Tier I Permit Renewal Application  
Lewiston Wood Products, Inc. - *Clearwater*  
Lewiston, Idaho



Dear Mr. Simon:

Potlatch Forest Products Corporation (Potlatch) owns and operates the Lewiston Wood Products lumber manufacturing facility in Lewiston, Idaho. The Lewiston facility is governed by a Tier I air operating permit that will expire on December 10, 2007. On behalf of Potlatch, Geomatrix Consultants has prepared a Tier I renewal application. Mr. Bill Highsmith, Manufacturing Manager at Potlatch, has signed the appropriate certifications in the renewal application.

As recommended by Ken Hanna, we have enclosed two copies of the renewal application. Please feel free to call me or Lewiston Wood Products' Environmental Coordinator, Jim Miller, at 208.799.1697 if you have any questions about this application.

Respectfully,  
GEOMATRIX CONSULTANTS, INC.

A handwritten signature in blue ink that reads "Eric Hansen".

Eric Hansen  
Principal

cc: Jim Miller Lewiston Wood Products Environmental Coordinator



---

**Tier I Operating Permit Renewal Application  
Potlatch Forest Products Corporation  
Lewiston Wood Products**

Lewiston, Idaho

*Prepared for:*

**Potlatch Forest Products Corporation  
Lewiston Wood Products**  
807 Mill Road  
Lewiston, Idaho 83501

*Prepared by:*

**Geomatrix Consultants, Inc.**  
3500 – 188<sup>th</sup> Street SW, Suite 600  
Lynnwood, Washington 98037  
(425) 921-4000

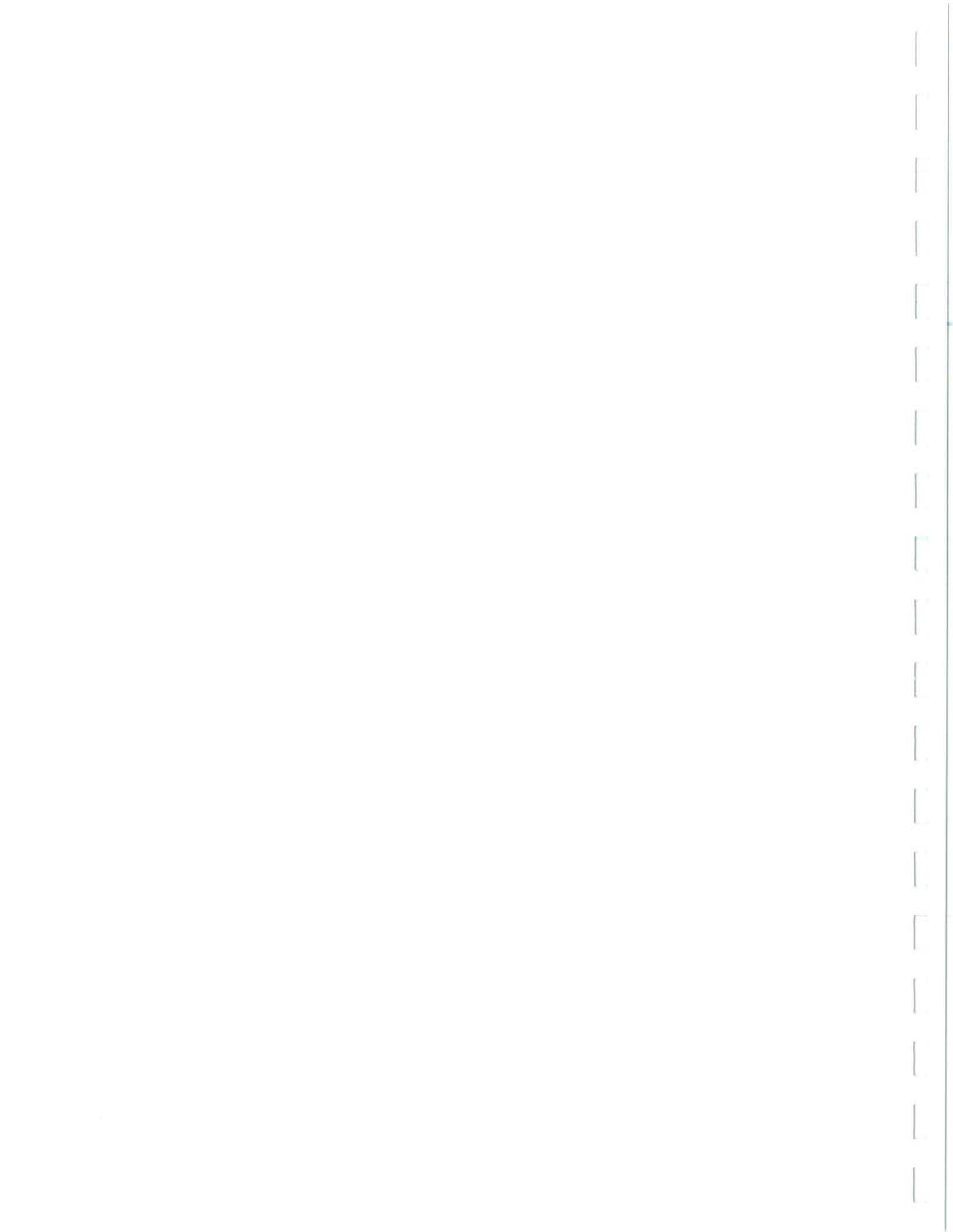
June 2007

Project No. 011166.002

---



**Geomatrix**



## TABLE OF CONTENTS

	Page
1.0 INTRODUCTION .....	1
2.0 FACILITY LOCATION, NAAQS STATUS AND PROCESS DESCRIPTION.....	3
2.1 PROCESS DESCRIPTION .....	3
2.1.1 Log Handling .....	3
2.1.2 Sawmill .....	3
2.1.1 Kilns .....	3
2.1.1 Surfacing.....	6
2.1.1 Profile and Specialties .....	6
2.2 SUPPORT OPERATIONS.....	6
3.0 EMISSION SOURCES AND ESTIMATES.....	7
3.1 LUMBER DRYING KILNS .....	7
3.2 MATERIALS HANDLING PROCESS EQUIPMENT.....	9
3.2.1 Cyclones .....	9
3.2.2 Baghouses.....	9
3.2.3 Process Fugitive Emissions .....	10
3.3 EMERGENCY EQUIPMENT .....	10
3.4 INSIGNIFICANT SOURCES .....	11
4.0 POTENTIALLY APPLICABLE REGULATIONS.....	13
4.1 FEDERAL REQUIREMENTS.....	13
4.1.1 National Emission Standards for Hazardous Air Pollutants.....	13
4.1.2 New Source Performance Standards .....	13
4.1.3 Prevention of Significant Deterioration.....	14
4.1.4 Title IV Acid Rain Provisions .....	14
4.1.5 Title V Operating Permit .....	14
4.1.6 Compliance Assurance Monitoring.....	14
4.1.7 Other potentially applicable requirements.....	14
4.2 STATE REQUIREMENTS .....	15
4.2.1 Permit to Construct Program .....	15
4.2.2 Tier I Operating Permit .....	16
4.2.3 General State Requirements .....	16
5.0 COMPLIANCE CERTIFICATION .....	19
6.0 COMPLIANCE PLAN AND SCHEDULE .....	21
G-1 SAWMILL TO KILNS.....	6
G-2 SURFACING .....	8
G-3 PROFILE.....	10
G-4 SPECIALTIES .....	11



## **TABLES**

Table 1	Maximum Kiln Potential Throughput
Table 2	Baghouse Flow Rates
Table C-1	Point Emission Sources
Table C-2	Potential Emission Rates for Criteria Pollutants
Table C-3	Potential Emission Rates for TAPs and HAPs
Table C-4	Point Source Parameters
Table E-1	Requirement-Specific Compliance Certification and Demonstration at the Time of Application Submission
Table F-1	Federal Regulatory Requirements

## **FIGURES**

Figure 1	Facility Location
Figure 2	Facility Plot Plan
Figure G-1	Sawmill to Kilns Process Flow Diagram
Figure G-2	Surfacing Process Flow Diagram
Figure G-3	Profile Process Flow Diagram

## **APPENDICES**

Appendix A	Air Quality Operating Permit Application Checklist
Appendix B	Operating Permit Application forms and Compliance Certification
Appendix C	Facility Wide Emission Inventory
Appendix D	Facility's Insignificant Activities
Appendix E	Requirement-Specific Compliance Certification and Demonstration Methodology
Appendix F	Potentially Applicable Regulations
Appendix G	Process Flow Diagrams
Appendix H	Baghouse CAM Plan

## ACRONYMS

CAAA	Clean Air Act Amendments
CFR	Code of Federal Regulations
CO	Carbon Monoxide
DEQ	Idaho Department of Environmental Quality
EU	Emission Unit
EPA	U.S. Environmental Protection Agency
IDAPA	Idaho Administrative Procedures Act
IEU	Insignificant Emission Unit
LCP	Lewiston Cedar Products (Specialties and Profile processing)
LWP	Lewiston Wood Products
MACT	Maximum Achievable Control Technology
MBF	Thousand Board Feet
NESHAP	National Emission Standards for Hazardous Air Pollutants
NSPS	New Source Performance Standards
NO <sub>x</sub>	Nitrogen Oxides
PM-10	Particulate Matter with an aerodynamic diameter of 10 µm or less
PSD	Prevention of Significant Deterioration
PTC	Permit to Construct
SO <sub>2</sub>	Sulfur Dioxide
TPY	Tons Per Year
UTM	Universal Transverse Mercator
VOC	Volatile Organic Compounds





## **TIER I OPERATING PERMIT RENEWAL APPLICATION**

**Lewiston Wood Products.**  
**Lewiston, Idaho**

### **1.0 INTRODUCTION**

This application is submitted for the Potlatch Forest Products Corporation's Lewiston Wood Products (LWP) lumber manufacturing facility and related operations at 807 Mill Road, Lewiston, Idaho 83501 (hereafter, the "Facility"). The Facility is adjacent to two other Potlatch facilities, the Idaho Pulp and Paper Division (IPPD) and the Consumer Products Division (CPD). The Facility is governed by a Tier I operating permit issued on December 10, 2002, and amended on July 18, 2003 (T1-030203) and August 18, 2006 (T1-060206). Consistent with IDAPA 58.01.01.313.03, LWP is submitting this renewal application more than six months prior to the December 10, 2007 expiration of the existing Tier I permit.

This application presents the information required by IDAPA 58.01.01.314 for the facility's current operations. Several changes that have taken place since the original Tier I permit was issued:

- Because Potlatch has changed the name of the Facility from "Clearwater" to "Lewiston Wood Products", the numbering system for Emission Point/Source Identification is changed from "CW" (Clearwater) to "LWP" (Lewiston Wood Products).
- As authorized by Permit to Construct (PTC) P-050200 issued August 16, 2005, the masonry and LSI lumber drying kilns listed in the 2002 Tier I permit have been replaced with four new kilns.
- PTC P-060205 authorized the transfer of control of the fuel hog cyclone from IPPD to LWP. Accordingly, its ID has been changed from "IPPD point 782" to "LWP-CY-FH".

DEQ's checklist of required information is provided as Appendix A. Appendix B contains DEQ's standard *General Information* form and a signed compliance statement that addresses the requirements in IDAPA 58.01.01.314.01.a and 314.09.a. A facility-wide emission inventory and a list of Insignificant Emission Units (based on size or production rate) are provided in Appendices C and D, respectively. Appendix E identifies facility-wide and emission unit-specific conditions that already apply to the Facility. Appendix F lists potentially

applicable federal and state regulations. Process flow diagrams are provided in Appendix G, and Compliance Assurance Monitoring plans for baghouses potentially subject to CAM are provided in Appendix H.

## **2.0 FACILITY LOCATION, NAAQS STATUS AND PROCESS DESCRIPTION**

The Facility is located on the eastern edge of Lewiston, in Nez Perce County (Figure 1). Nez Perce County is attainment or unclassifiable for all criteria pollutants. 40 CFR § 81.313; 40 CFR § 52.672. Figure 2 provides a facility plot plan depicting key building locations.

LWP manufactures boards and dimension lumber. The facility consists of log yards, a covered area with de-barkers and cutoff saws, one main sawmill building, four dry kilns, the surfacing building, the Lewiston Cedar Products (specialty & profile) building, four emergency firewater engines, two emergency generator, several storage buildings, and a number of smaller structures. These structures include a fire station, management buildings, and various repair and workshops. All steam used by LWP is purchased from the adjacent IPPD boilers. The lumber manufacturing process is outlined in greater detail below; process flow diagrams are provided in Appendix G.

### **2.1 PROCESS DESCRIPTION**

#### **2.1.1 Log Handling**

Logs are brought in via truck and railcar and stored in the log yards. A sprinkler system sprays water over the logs to maintain log quality and to control dust. The logs are retrieved by large log handlers and delivered to the de-barkers. The logs are cut to length as they enter the main sawmill building.

#### **2.1.2 Sawmill**

Various optimizations are applied to cutting the logs to maximize useable lumber per log. There are several saws, trimmers and sorters in the main sawmill building, and the logs take many different routes as they are cut to lumber. The lumber is then stacked and taken to either outdoor or indoor storage areas.

Dust from sawmill machine centers is captured from shrouds at each machine under negative pressure and drawn to the sawmill's pull-through cyclones CY-26, CY-27A and CY-27B.

#### **2.1.1 Kilns**

The stacked lumber is moved to the dry kilns, where heat is applied via steam purchased from IPPD. On average, the new double-track kilns are able to dry up to 230.4 thousand board feet (MBF) of lumber in about 31 hours. Emissions from the kilns are uncontrolled.



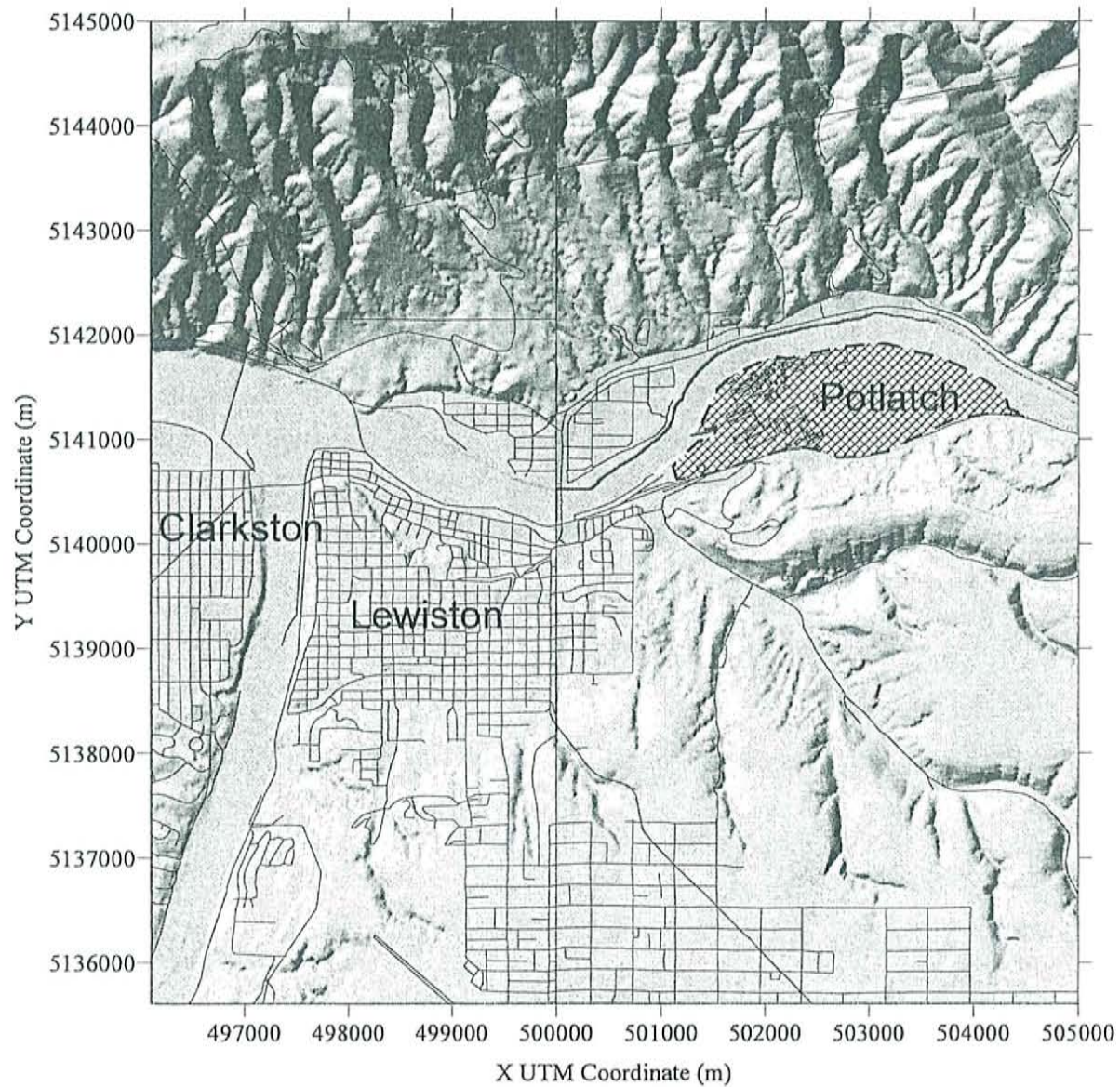


FIGURE 1. FACILITY LOCATION

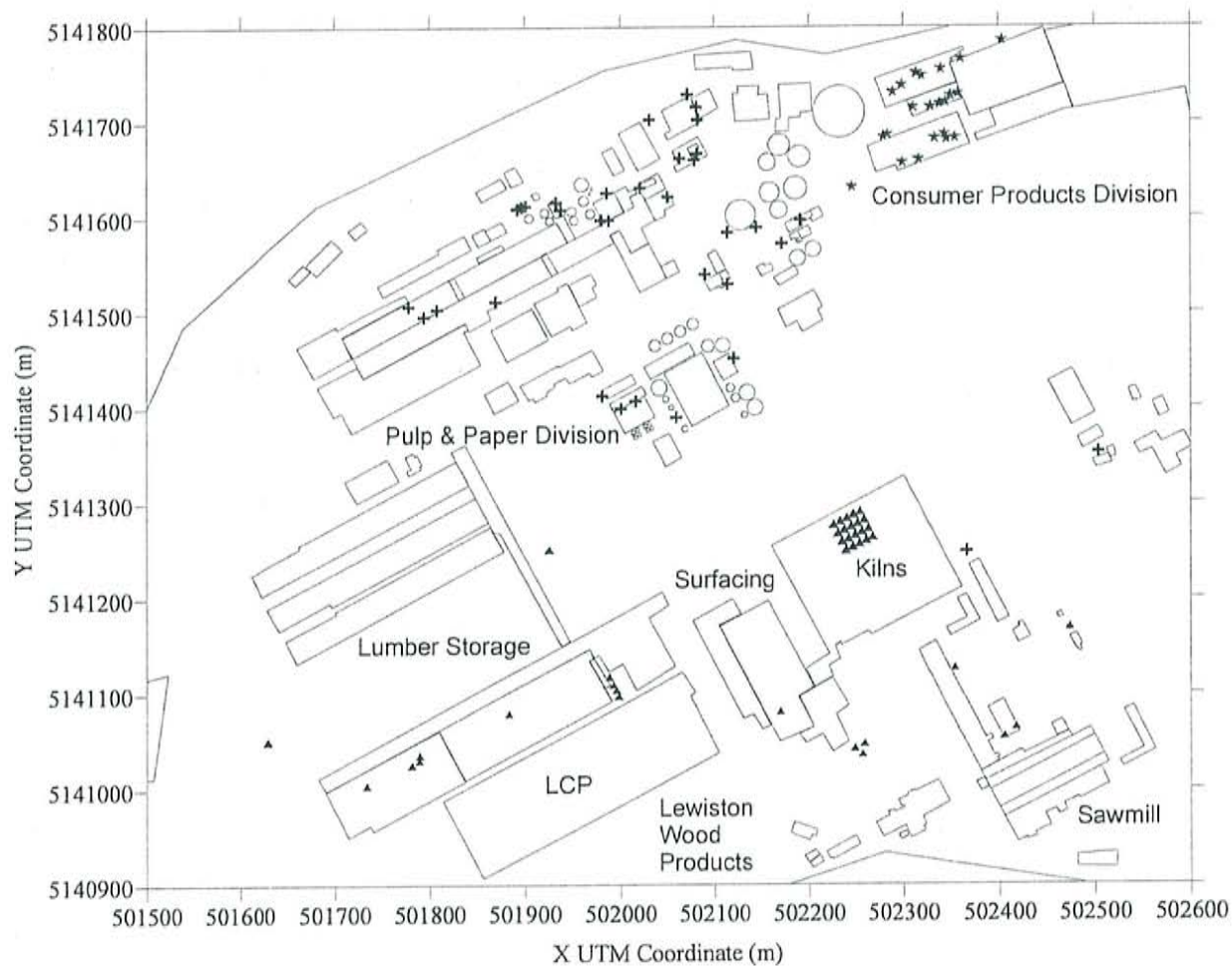


FIGURE 2. FACILITY PLOT PLAN

### **2.1.1 Surfacing**

After drying, lumber is staged in the storage yard or secondary storage areas until it is planed and trimmed to length in the surfacing building to make finished lumber. It is then packaged, stored in local sheds, and loaded onto trucks and railcars and shipped.

Wood trims are fed to the Bruks chipper. The chips are transported via cyclone CY-25 to the Pulp & Paper chip pile. Dust from Surfacing is drawn to the pull-through cyclone CY-18 and on to baghouses BH-1, BH-2 and BH-3.

### **2.1.1 Profile and Specialties**

Some of the lumber is also diverted to the Lewiston Cedar Products department (also known as Profile and Specialties), where it is milled into various trim or profiled specialty products. It is then packaged, stored in local sheds, and loaded onto trucks and railcars and shipped. Profile and Specialties also purchases lumber from outside sources.

Profile and Specialties operate cyclones CY-1, CY-2, CY-3, CY-4, CY-6, and baghouses BH-4, BH-5, BH-6 and BH-7.

## **2.2 SUPPORT OPERATIONS**

LWP operates two emergency generators and four firewater pump engines. These engines do not operate except for brief weekly testing and emergencies.



### **3.0 EMISSION SOURCES AND ESTIMATES**

This section addresses Facility emissions of criteria pollutants and HAPs (as defined by IDAPA 58.01.01.006.81) and TAPs (defined by IDAPA 58.01.01.585 and 586).

The existing Tier I permit aggregates emission sources at the Facility into the following general emission units:

- EU1: lumber drying kilns;
- EU2: sawmill, surfacing, profile and specialties (Lewiston Cedar Products); and
- EU3: emergency equipment.

Descriptions of these emission units follow. A list of point sources is presented in Table C-1 (Appendix C). Appendix C also includes a facility-wide potential emissions inventory for criteria pollutants (Table C-2) and TAPs/HAPs (Table C-3).

Facility-wide emission of criteria pollutants, HAPs, and TAPs were calculated using methods similar to those used in Potlatch's annual Air Emissions Fee calculations, except that worst-case tree species (rather than actual species mix percentages) were assumed, and the facility was assumed to operate 8760 hours per year (rather than the actual hr/yr utilization).

The maximum possible production rate of the kilns is 351,009 MBF/yr, as established in the Kiln Replacement Project PTC (P-050200). Because the kilns are the "bottleneck" for overall production at the Facility, this production rate is used to determine the PTE of several of the sources.

#### **3.1 LUMBER DRYING KILNS**

As mentioned above, the 31 masonry kilns (built in the 1930s) and the LSI kiln (built in 1988) have been demolished and replaced with four double-track kilns manufactured by Wellons. Each kiln has twenty 28-inch square roof vents that open and close automatically as the lumber is dried.

Air pollutant emissions from dry kilns depend on the species of wood dried and the throughput of the kilns for that species. Maximum potential throughputs, expressed in thousands of board feet (MBF), for the dry kilns are presented in Table 1. Actual throughput rates are much lower.

**TABLE 1. MAXIMUM KILN POTENTIAL THROUGHPUT**

Tree Species	Hours per charge	Bf per kiln per charge	MBF per kiln per hr	MBF per kiln per yr	Total Potential MBF/yr
Hemlock	31	230,400	7.43	65,107	260,426
Fir/Larch	23	230,400	10.02	87,752	351,009
Cedar	21	161,280	7.68	67,277	269,107

Maximum potential emissions are based on continuous operation, drying the species resulting in the highest emissions (hemlock for PM10 and fir/larch for VOC). Calculated PM10 and VOC emission rates are given in Table 2, by assuming 100% utilization of the kilns for each tree species. The maximum potential PM10 emission rate corresponds to drying hemlock, and the maximum potential VOC emission rate corresponds to drying fir/larch. These values, with their corresponding throughputs, are listed in Table C-2.

**TABLE 2. PM10 AND VOC EMISSION RATES, TOTAL FOR ALL KILNS**

Tree Species	PM10			VOC		
	lb/MBF	lb/hr	Ton/yr	lb/MBF	lb/hr	Ton/yr
Hemlock	0.051	0.38	6.6	0.53	3.94	69.0
Fir/Larch	0.02	0.22	3.7	0.61	6.11	107.1
Cedar	0.040	0.31	5.4	0.142	1.09	19.1

PM10 emission factors for fir and hemlock are from Oregon Department of Environmental Quality Emission Factors for Wood Products (AQ-EF02, June 26, 2003). This document contains emission factors based on an Oregon State University/Willamette Industries study and a University of Idaho/National Council for Air and Stream Improvement study. The PM10 emission factor for cedar is from the Olympic Region Clean Air Agency's Dry Kiln Factors Summary (April 8, 1999, underlying study reference: Weyerhaeuser Office of the Environment, March 1999).

Kilns also emit chemical compounds deemed toxic air pollutants (TAPs) by IDAPA 58.01.01.586 and hazardous air pollutants (HAPs) under CAA section 112(b). Table C-3 identifies emission factors, production rates, and TAP emissions associated with the lumber drying kilns. Note that the analysis presented in Table C-3 is conservative because it is based the tree species with the worst case emission rate (not the actual or typical tree species ratio)



and the maximum possible production rate (not the potential production rate for each tree species). The annual PTE is found by multiplying the maximum total production rate (351,009 MBF/yr) by the emission factor. For example, we assumed 100% drying of White Fir for methanol and formaldehyde.

### **3.2 MATERIALS HANDLING PROCESS EQUIPMENT**

The process buildings at the Facility are all under negative pressure, with outlets through either cyclones or baghouses. Previous applications have listed building vents (CW-BV-1 through CW-BV-10). However, most of these actually serve as inlets, not outlets.

#### **3.2.1 Cyclones**

Eleven cyclones are used to pneumatically convey wood residuals (primarily sawdust). The quantity of sawdust production is estimated by scaling annual lumber production against lumber production in 1999, when Potlatch produced a detailed assessment of production, trim and waste rates for the mill.

The maximum possible annual total lumber production rate for the existing facility is 351,009 MBF/yr. Following the annual Air Emissions Fees method, we scaled the 1999 tons/year of sawdust to each cyclone by the ratio of the maximum annual production rate. PM10 Emission factors are calculated using engineering formulae following Robbins (1998)<sup>1</sup>, with the “number of turns” calculation according to Wark and Warner (1981)<sup>2</sup>. The resulting emission factors are in units of pounds of emissions per ton of sawdust. These emission factors were recently reviewed and accepted by DEQ as part of the 2005 Kiln Replacement Project PTC (P-050200).

#### **3.2.2 Baghouses**

Seven baghouses at the Facility are employed to control PM/PM10 emissions. PM10 emission factors from the baghouses were calculated using the vendor-supplied emission rate of 0.003 grains/cubic foot. This was then multiplied by airflow (cubic feet/minute, see Table 3) and the units converted (60 min/hr and 7000 gr/lb) to develop an emission factor in units of lb/hr. These are the same emission factors Potlatch used in the kiln PTC application and has been using for its annual Air Emissions Fee calculations. Each potential to emit is based on 8,760 hours of operation per year.

<sup>1</sup> Robbins, R. M., Using a computerized spreadsheet: Part II – Cyclone separator design. *Pollution Engineering*, March, 1988.

<sup>2</sup> Wark, K. and Warner, C. F., 1981. *Air Pollution: Its Origin and Control*. New York: Harper and Row, p. 185-9.

**TABLE 3. BAGHOUSE FLOW RATES**

<b>Baghouse</b>	<b>Flow rate</b>
BH-1, Surfacing Baghouse	36000 cfm
BH-2, Surfacing Baghouse	38000 cfm
BH-3, Surfacing Baghouse	41000 cfm
BH-4, Profiles Baghouse	45000 cfm
BH-5, Profiles Baghouse	43000 cfm
BH-6, Profiles Baghouse	35000 cfm
BH-7, Profiles Baghouse	33000 cfm

### 3.2.3 Process Fugitive Emissions

Various fugitive PM<sub>10</sub> sources exist at the Facility, including the 27-inch, 35-inch, and 50-inch debarkers, and the 27-inch and 35-inch cut-off saws, as well as fugitive dust from paved and unpaved roads.

Lewiston Cedar Products used 52,439 lbs. of VOC-containing adhesives in 2002; 47,340 lbs. in 2003; and 54,940 lbs. in 2004. For each of these years, the hours of operation were the same: 2080 hr/year. As a conservative estimate, we chose the year with the highest glue usage and scaled by the hours of operations ( $54,940 \times 8760 / 2080$ ) to estimate that 231,382 lbs. of glue would be used if Lewiston Cedar Products operated 24 hours per day for an entire year. Using emission factors for formaldehyde (0.0014 lb per lb. of glue) and for VOCs (vinyl acetate and glycol ether, 0.029 lb per lb. of glue) from the MSDS leads to a combined emission factor of 0.0307 lb of VOCs per lb. of glue. This is the same emission factor Potlatch has been using for its annual Air Emissions Fee calculations. The annual PTE is found by multiplying the amount of glue that would be used by the combined emission factor.

### 3.3 EMERGENCY EQUIPMENT

LWP operates four diesel-fueled engines (LWP-IC-1, 2, 3, &4) that are used to power fire water pumps in the event of a fire. They are typically operated for testing purposes only for approximately 19 hours per year. LWP also operates a 125 hp engine at the greenhouse and another at the office to provide electricity in the event of a power outage.

These emission units are exempt from the requirements to obtain a PTC and, operated for the purposes for which they were installed, are IEUs for the purposes of the Tier I program. The current Tier I permit identifies the diesel engines and the greenhouse generator engine as Emission Unit Group 3, but only applies general 58.01.01 conditions. LWP requests that these



emission units be acknowledged as IEUs and that EU Group 3 be eliminated from the re-issued Tier I permit.

Pollutant emissions are normally limited to periods when the emergency equipment is tested and maintained. Hypothetical annual emissions conservatively based on operation for 500 hours per year are presented in Appendix C. Emissions from the emergency equipment are calculated using AP-42 *Section 3.3, Gasoline and Diesel Industrial Engines*.

### **3.4 INSIGNIFICANT SOURCES**

Activities and emission units identified as insignificant under IDAPA 58.01.01.317.01(b) are required to be listed in a Tier I operating permit to qualify for a permit shield. These are listed in Appendix D.

The natural gas engine ME-49 (located near the main gate) listed in the existing Tier I permit has been converted to propane.

The propane-fired emergency generator ME-50 (located in the Greenhouse) listed in the existing Tier I permit has been replaced with a 90 kW diesel-fired emergency generator, though it retains the ME-50 designation.

The propane-fired heaters ME-51 and ME-52 listed in the existing Tier I permit (each listed as "< 5 MMBtu/hr") actually consists of three classes of heaters. There are five model PV250 (250 MBtu/hr) and twelve model PV350 (350 MBtu/hr) heaters, and one ceiling-mounted Solaronics model STG-100-50BL (100 MBtu/hr) infrared heater in the greenhouse. Thus the total capacity for all 18 Greenhouse heaters is 5.5 MMBtu/hr.





## **4.0 POTENTIALLY APPLICABLE REGULATIONS**

The Facility is subject to federal and state air pollution control regulations. This section discusses applicable regulations and details why other federal and state regulations are not applicable.

### **4.1 FEDERAL REQUIREMENTS**

#### **4.1.1 National Emission Standards for Hazardous Air Pollutants**

The Clean Air Act Amendments of 1990 require EPA to establish technology-based standards to control hazardous air pollutants (HAPs). For MACT purposes, a major source is defined as one with a potential to emit (PTE) greater than 10 TPY of a single HAP or more than 25 TPY of all HAPs combined.

The facility-wide annual HAP PTE summarized in Appendix C indicates that, with the new kilns in place, potential emissions of methanol exceed 10 TPY and total facility-wide HAP emissions exceed 25 TPY. Consequently, LWP is a major source with respect to the MACT. Because it operates kilns, the facility is subject to the Plywood and Wood Composite MACT standards. However, the only requirement for owners of facilities subject to this MACT operating only dry kilns is an initial notification; Potlatch notified DEQ and EPA of applicability on January 18, 2005. There are no emission limits or control requirements for lumber dry kilns under this MACT.

#### **4.1.2 New Source Performance Standards**

EPA has established New Source Performance Standards (NSPS) for new, modified, or reconstructed facilities and source categories. Typically, one or more NSPS apply to boilers found at sawmills with dry kilns, but LWP does not operate any boilers.

EPA has promulgated new source performance standards (NSPS) for stationary compression ignition internal combustion engines, codified 40 CFR Part 60 Subpart IIII. Affected engines are those constructed, modified or reconstructed after July 11, 2005. The pollutants regulated are NOX, particulate matter (PM), CO and non-methane hydrocarbons (NMHC). Sulfur oxides (SOX) will also be controlled through low sulfur fuel. Allowed emissions depend on the model year and size, and are in the form of grams per horsepower-hour. Compliance requirements rests with the manufacturer for engines built after 2007, and is done via stack tests. Monitoring requirements for operators are dependent on the type of controls used. Recordkeeping and reporting requirements depend on the size of the engine.

Compression ignition engines operated at LWP were constructed prior to July 11, 2005, and have not been modified or reconstructed since then. LWP will comply with the proposed NSPS for compression internal combustion engines for any sources subject to this regulation.

#### **4.1.3 Prevention of Significant Deterioration**

Lumber manufacturing facilities are not designated facilities under 40 CFR 52.21(b); as such, these types of facilities are deemed minor sources for the purposes of major new source review (i.e., the Prevention of Significant Deterioration (PSD) program in attainment or unclassified areas) unless emissions of a regulated pollutant equals or exceeds 250 tons per year. As indicated in Appendix C, the Facility's PTE of any single regulated criteria pollutant is less than the 250 ton major source threshold. Accordingly, the Facility is not subject to the PSD program.

#### **4.1.4 Title IV Acid Rain Provisions**

Title IV of the federal Clean Air Act regulates sulfur dioxide and oxides of nitrogen emissions from fossil fuel-fired electrical generation facilities. The Facility is not subject to the Title IV Acid Rain Provisions in the Clean Air Act.

#### **4.1.5 Title V Operating Permit**

EPA's Title V program is administered by DEQ in Idaho, and is referred to as the "Tier I Operating Permit Program" in Idaho. LWP submits all reports and certifications to DEQ. Please refer to section 4.2.2 for additional discussion of the Tier I program applicability.

#### **4.1.6 Compliance Assurance Monitoring**

Subject to certain exemptions (40 C.F.R. § 64.2(b)), the Compliance Assurance Monitoring (CAM) rule requires certain major sources<sup>3</sup> using pollution control devices to meet an emission limit to employ parametric monitoring. CAM may apply to the seven baghouse employed at LWP, and CAM plans for those baghouse are provided in Appendix H

#### **4.1.7 Other potentially applicable requirements**

##### Asbestos NESHAP, 40 CFR 61 Subpart M

LWP will comply with the applicable regulations in 40 CFR Part 61 Subpart M for any asbestos renovation.



Prevention of Accidental Releases, CAA § 112(r), 42 U.S.C. 7412(r)(1), and Chemical Accident Prevention, 40 CFR Part 68

LWP will comply with the applicable parts of 40 CFR Part 68 if any chemicals are stored onsite above threshold quantities. There are currently no areas onsite that store listed chemicals above threshold quantities.

Protection of Stratospheric Ozone, Recycling and Emissions Reduction, 40 CFR 82 Subpart F.

LWP will comply with the applicable standards in 40 CFR 82 Subpart F for recycling and recovery of refrigerants.

Other potentially applicable requirements are summarized in Appendix F.

## **4.2 STATE REQUIREMENTS**

### **4.2.1 Permit to Construct Program**

DEQ's PTC regulations require all facilities to obtain a PTC or a documented exemption determination before beginning construction of a new source of air pollution or modifying an existing source in a manner that would cause its emissions to increase. Since the Tier I permit was initially issued in 2002, there have been two PTCs and an exemption determination addressing modifications at LWP.

In June 2004, LWP conducted and documented an exemption determination for changes to the #2 planer line. Specifically, LWP installed a lumber grade optimizer that controls how a log is sawn to maximize production of lumber, minimize waste, and optimize lumber sizes having the greatest market demand. That project was not expected to increase the number of logs sawn, debarked, or dried. The exemption determined that the increase in PM10 emissions would be Below Regulatory Concern.

In December 2004, a PTC application was submitted for the replacement of existing dry kilns with new kilns having a higher throughput capacity. The permit was issued in 2005 and the kilns are now in operation. Although the PTC issued for the kiln replacement project includes annual emission limits on formaldehyde and acetaldehyde, Potlatch requests that these emission limits not be included in the new air operating permit because they are state-only requirements. Potlatch intends to submit a PTC application to remove these limits based 1) on the

---

<sup>3</sup> Major source has the same meaning as provided in 40 C.F.R. Part 70. 40 C.F.R. § 64.1.

inappropriate rationale expressed in the PTC statement of basis and 2) on the fact that these pollutants are already addressed in the Plywood and Wood Composite MACT standards.

In 2006, a PTC application was submitted to transfer ownership of a fuel hog from IPPD to LWP. The fuel hog grinds trim wood from LWP operations and pneumatically conveys it to a storage pile for IPPD's hog fuel boiler. A permit was issued in October 2006.

LWP will continue to comply with the requirements of the rule and will submit PTC applications before constructing any new sources or modifying any existing sources when a PTC is required.

#### **4.2.2 Tier I Operating Permit**

LWP submitted the Facility's original Tier I application in 1995 and submitted supplemental information on June 13, 2002. DEQ issued the Facility's original Tier I Operating Permit on December 10, 2002. At LWP's request, the Tier I permit was revised to eliminate reference to a fifth (and non-existent) fire-water pump and the permit was reissued on July 18, 2003. Also at LWP's request, DEQ revised the Tier I permit with an administrative amendment changing the name of the owner from Potlatch Corporation to Potlatch Forest Products Corporation; the revised permit was issued August 18, 2006.

The current Tier I Operating Permit will expire on December 10, 2007. As required by IDAPA 58.01.01.313.03, LWP must submit a complete renewal application at least six months prior to the permit expiration. This document meets the requirements of the renewal application.

Appendix D provides a listing of Insignificant Emission Units and activities at the Facility. Appendix E identifies Facility-wide and emission unit specific conditions that apply to the Facility.

#### **4.2.3 General State Requirements**

Idaho has no performance or technology standards specifically for lumber manufacturing facilities. Some additional applicable state requirements include:

- opacity [IDAPA 58.01.01.625]
- fugitive particulate matter emissions [IDAPA 58.01.01.650-651]
- excess emissions [IDAPA 58.01.01.131]

Tier I Operating Permit Renewal Application

- open burning [IDAPA 58.01.01.600]
- compliance testing [IDAPA 58.01.01.157]
- State-only requirements (which are not applicable within the meaning of 40 CFR Part 70) include:
  - nuisance odors (state-only) [IDAPA 58.01.01.776.01]
  - pollutants regulated by IDAPA 58.01.01.585-586 (state-only) [IDAPA 58.01.01.210; IDAPA 58.01.01.585-586]

A listing of the other potentially applicable federal and state air quality regulations is included as Appendix F.





## **5.0 COMPLIANCE CERTIFICATION**

The Facility is currently in compliance with all applicable requirements. Appendix E provides the current compliance status and an explanation of how the compliance determination was evaluated for each specific applicable requirement.

IDAPA 58.01.01.314.09.b mandates that the applicant provide a schedule for submitting compliance certifications during the Tier I permit term. The facility's current Tier I permit requires LWP to submit semi-annual monitoring reports and an annual compliance certification. LWP proposes that the reporting periods be January 1<sup>st</sup> through June 30<sup>th</sup>, and July 1<sup>st</sup> through December 31<sup>st</sup>.



## **6.0 COMPLIANCE PLAN AND SCHEDULE**

The Facility is currently in compliance with all applicable requirements. LWP is not aware of any new potentially applicable federal or state requirements that will become effective during the term of the Tier I operating permit. However, if any applicable requirements take effect during the facility's Tier I operating permit term, LWP will meet the applicable requirement as expeditiously as possible. If an applicable requirement with a specific timeline for compliance becomes effective during the permit term, LWP will comply with the requirement on the schedule established by the requirement.

